

Denise Carlon, ESQUIRE  
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Attorneys for Ditech Financial LLC

IN THE MATTER OF:

Tiphany M. Delgado

DEBTOR,

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 16-32992-JNP

1. NOTICE OF OBJECTION

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **Ditech Financial LLC**, the holder of a Mortgage on the debtors' premises at **3137 S. Congress Rd, Camden, NJ 08104** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. On or before the deadline for filing a claim, which is April 5, 2017, the Movant will file a secured proof of claim for pre-petition arrears in the approximate amount of \$4,501.65.
2. Debtor's plan provides for payment in the amount of \$2,550.00 towards the arrearage claim of the Movant.
3. Debtor's Plan understates the amount of the Movant's claim by \$1,951.65, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Movant.
5. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/ Denise Carlon, Esquire

Denise Carlon, ESQUIRE  
Attorney for Ditech Financial LLC

Dated: January 12, 2017